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January 12, 2024

Via Email

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Re: Hunt v. Southern Baptist Convention, et al.  
No. 3:23-cv-243 (M.D. Tenn.)

Dear Robert:

We are in receipt of your January 6, 2023 letter concerning Guidepost Solutions LLC's ("Guidepost") document productions.

We have had an opportunity to review the documents you referenced in your January 6 letter (from the documents produced to you by the [REDACTED]), and we also have gone back to review some of the documents we produced to Plaintiff so far in this case.

Due to human error in the collection of certain documents, there are additional documents we have now received from our client that are likely responsive to Plaintiff's document requests.

We are reviewing those documents now for responsiveness and privilege and will promptly produce them once that review is complete.

To be clear, we are not aware of any documents that were destroyed or deleted, as you suggest in your letter and as you suggested on Wednesday to the Court. Additionally, no documents were withheld intentionally. This is simply the result of a gap in the collection process that we are rectifying presently. We appreciate you bringing this to our attention.

On that note, however, we were surprised to learn during Tuesday's Court conference that Plaintiff had received the [REDACTED] document production back on December 15 but only provided them to defense counsel on January 6, more than 3 weeks later. Frankly, had we received the documents right after your client received them, we likely would have determined on our own the inadvertent collection error on our part and would have rectified it a few weeks ago. Having said that, we are working to do that now.

Very truly yours,

s/Steven Mintz  
Steven Mintz

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